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September 22, 2003

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The Honorable Catherine C. Blake
United States District Judge
U. S. District Court for the District of Maryland
U.S. Courthouse
101 West Lombard Street
Baltimore, MD 21201

**RE: *American Sugar Refining Co., Inc. etc. v. M/V
Aliana Princess etc., et al.***
Civil Action No.: CCB-03-CV-329

Dear Judge Blake:

Counsel have been working diligently to settle this case without the necessity of formal discovery, including the retention of experts and preparation of formal expert reports. Due to the distance between the parties, there has been some delay, but we are still optimistic that the case can be settled within the next sixty days.

As September 22, 2003 is Plaintiff's deadline for designating experts and providing information concerning those experts pursuant to Rule 26(a)(2), we would respectfully request that the dates set forth in the Court's Scheduling Order dated July 23, 2003 be moved forward sixty days as follows:

1. Plaintiff's Rule 26(a)(2) disclosures re experts – November 24, 2003;
2. Defendant's Rule 26(a)(2) disclosures re experts – December 22, 2003
3. Plaintiff's rebuttal Rule 26(a)(2) disclosures re experts – January 5, 2004;

*Admitted in the District of Columbia and Maryland

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4. Rule 26(e)(2) supplementation of disclosures and responses – January 12, 2004;
5. Discovery deadline; submission of status report – February 5, 2004;
6. Request for admission – February 12, 2004; and
7. Dispositive pre-trial motions deadline – March 5, 2004.

All other provisions of the Court's Scheduling Order would remain the same.

Counsel for the M/V ALIANA PRINCESS and Mystique Shipping Co., Ltd. has no objection to this request.

Thank you for your consideration.

Very truly yours,
/s/
James D. Skeen

cc: Robert B. Hopkins, Esq.
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Jeffrey J. Asperger, Esq.